

## **REMARKS**

Claims 1, 3-17, 19, 20, 22-27 and 30-34 are now pending in the application. Claims 30-34 are new. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1, 3-17, 19-20 and 22-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Horovitz et al. (U.S. Pat. No. 6,389,409) in view of Wical (U.S. Pat. No. 6,487,545) and further in view of Nichols et al. (US Pub 2003/0055652 A1). This rejection is respectfully traversed.

Initially, claims 1, and 25 have been amended to even more precisely define the claimed subject matter. More specifically, claim 1 has been amended to claim "a notification device that provides at least one of said single collaboration group and said more than one collaboration group with notification data based on said entries." Claim 25 has been amended along similar lines. The specification also states that the notification data may include an expiration date of the card catalog entries, steward employment data and other information additions and/or changes.

Regarding claims 1 and 25, Horovitz et al, Wical and Nichols et al fail to show, teach, or suggest a technology management system comprising a notification device that provides at least one of said single collaboration group and said more than one collaboration group with notification data based on said entries in a card catalog. Since this feature is absent from the cited references, and clearly would not be obvious from

this combination of references, reconsideration and withdrawal of the rejection of claims 1 and 25 is respectfully requested.

Applicant wishes to further comment that the present application claims a web-based collaboration tool enabling an individual to *populate* a card catalog, thereby updating the controlled lexicon. The term “populate” should be understood to include adding information to the card catalog. Applicant’s specification discloses “a single individual both adding information to the card catalog remotely via the web-based collaboration tool 50, and accessing the bookshelf via the web portal 52.” (see page 23, lines 5-8). Horovitz et al, however, fails to disclose a card catalog that can be *populated*, as well as accessed, by various individuals or diverse group of individuals. The Examiner stated that “‘LinkGraph’ is equivalent to ‘card catalog’”. Accordingly, Horovitz et al states:

It can be readily seen that the logical mesh of pages and links actually induces a graph data structure. *This induced graph is not created—* rather, it can be thought of as a view into the online catalog structure. This induced graph will be referred to as the LinkGraph . . .” (see col. 5, lines 50-54).

Therefore, it appears that the Horovitz et al reference does not involve using a “collaboration input” to obtain a relevant card catalog (i.e. LinkgGraph) and also to populate the card catalog. Thus, it does not disclose or suggest an important feature of the present application which is providing specific individuals or groups of individuals with the ability to access the card catalog, as well as the ability to populate it, to thus maintain the card catalog in an “up-to-date” state. Importantly, the card catalog of the

present system and method allows the up-dating to be done according to a lexicon based in the relevant technology that the users are working with (e.g. wings, flaps, engines, etc.).

Accordingly, since Horovitz et al, Wical and Nichols fail to teach, show or suggest a web-based collaboration tool for enabling individual stewards to populate a card catalog based on the technology-specific terminology data and collaboration input, and in view of the foregoing claim amendments, claims 1 and 25 should be in condition for allowance. Further, claims 3-17, 19-20, 22-24, 26, 27 and 30-34 depend from claims 1 and 25, and are therefore believed to be in condition for allowance for the reasons cited above. Reconsideration and withdrawal of this rejection are respectfully requested.

#### New Claim 35

New Claim 35 is essentially identical to Claim 1 as Claim 1 stood before the present amendment. The undersigned respectfully yet strenuously asserts that this claim is not obvious in view of Horovitz et al, Wical et al, Nichols et al, either singly or in any combination. With regard to Horovitz et al, the undersigned wishes to further emphasize several important differences between what is disclosed in this reference, and the system of the present application. Essentially, the Horovitz et al patent involves a system for obtaining a unified classification scheme based on pre-existing, multiple, and on-line catalogs, and where content can be unified in a resultant information graph. (See Background of Horovitz et al). These catalogs are also referred to in the Horovitz et al patent as “conceptualization systems,” and as “a classification information graph.”

The system of the present invention does not rely on pre-existing catalogs, but considers that the distributed source documents are uncatalogued. That is, the present

system interacts directly with a distributed network of document assets that are in no way placed in any form of prior developed, relevant navigation hierarchy. Much of the Horovitz et al reference focuses on the dynamic creation of a unifying information graph obtained from existing, logically correct catalogs.

The system and method of the present invention makes no use of such a capability, and furthermore does not rely on the existence of such a capability for its use and operation. The present system and method requires only the documents themselves, not any form of pre-existing classification catalog(s) for documents to be catalogued in a card catalog.

The Wical patent involves a classifier which is based on pre-existing independent static ontologies. These pre-existing ontologies are more elaborate -- in at least one way --than the online catalogs assumed by Horovitz et al. They are assumed to store "all senses for each word and concept" that they reference. However, the present system and method makes no assumption of either the simple a priori catalogs of Horovitz et al or the more sophisticated ontologies on Wical. In fact the distributed network of content that is addressed by the Applicants' system and method is itself in no way meaningfully catalogued, classified, or previously placed in relation to an ontology. As explained above with regard to Horovitz et al, such pre-existing cataloging of the documents is simply not required with the present system.

The primary use of the Wical patent is, given a set of terms (for example in a given document), to create a classification for the set of terms based on pre-existing catalogs of knowledge. The classifier itself is referred to as a "Knowledge Catalog Processor" and the basic function of this patent is outlined in Fig. 6 of Wical. However,

the source content in Applicant's system (which would be Wical's Words/Terminology in Fig. 6.) is not placed in reference to any other catalogs on knowledge. Also the result of the Wical "Knowledge Processor" is a classification of the Words/Terminology in an allegedly consistent overarching catalog consisting of static and dynamic elements, the static elements of which exist a priori. The Applicants' system, however, does not rely on static pre-existing ontologies, nor on the linking of such, nor on the broad and comprehensive word senses required for them, for its operation and use. The claimed system simply does not require the building of such "a priori ontologies".

Additionally, none of the above-discussed references, either singly or in combination, provides for a card catalog that can be populated with uncatalogued information input by individual stewards from the same or different collaboration groups, in accordance with a controlled lexicon of technology-specific terminology data. The references cited by the Examiner, to emphasize, require some sort of pre-cataloguing for the documents being handled. The system of claim 35 requires no such pre-cataloguing of the information before it can be input into the system. This is an important benefit and advantage for the present invention.

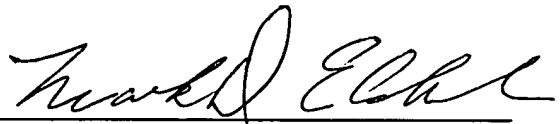
In view of these important distinctions, it is respectfully submitted that new claim 35 is presently patentable over the above discussed references and such action is respectfully requested.

### CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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